

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JOHN WILBANKS, JR,)	
)	
Plaintiff,)	
vs.)	
)	
SERGEANT JAY HOLLOWAY and DEPUTY)	CIVIL ACTION FILE
MICHAEL YARBROUGH,)	NO.:
)	
Defendants.)	3:25-CV-00136-LMM

**CONSENT MOTION FOR
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

COMES NOW, Defendants Sergeant Jay Holloway and Deputy Michael Yarbrough, with the consent of Plaintiff John Wilbanks, Jr., and move for an extension of time for the above Defendants to respond to Plaintiff's Complaint. The above Defendants request until January 9, 2026, to file an answer or other response to Plaintiff's Complaint, if such a responsive pleading is necessary. The parties have engaged in settlement negotiations are still in the process of trying to resolve this case. The parties require additional time to negotiate. Attached is a proposed order for the Court's convenience.

WHEREFORE, Defendants Sergeant Jay Holloway and Deputy Michael Yarbrough respectfully request that the Court extend the deadline for them to answer or otherwise file a responsive pleading until January 9, 2026.

This 4th day of December 2025.

/s/ Karen E. Woodward
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/s/ Edward Greenblat
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(Attorneys for Defendants)

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Consented to by:

SLATER LEGAL, PLLC

/s/ James M. Slater
James Slater
Georgia Bar No. 169869
*(w/ express permission by
E. Greenblat)*
Counsel for Plaintiff

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CERTIFICATE OF COMPLIANCE WITH L.R. 7.1

The undersigned attests that this document was prepared in Times New Roman, 14-point font that complies with this Court's Rules.

This 4th day of December, 2025.

**Cruser, Mitchell, Novitz, Sanchez,
Gaston & Zimet, LLP**

/s/ Edward Greenblat

Edward Greenblat

Georgia Bar No. 482735

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically submitted the foregoing ***CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT*** to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to counsel of record who are CM/ECF participants. Counsel of record are:

James Slater, Esq.
SLATER LEGAL PLLC
2296 Henderson Mill Road NE #116
Atlanta, Georgia 30345
james@slater.legal
Attorney for Plaintiff

This 4th day of December, 2025

**Cruser, Mitchell, Novitz, Sanchez,
Gaston & Zimet, LLP**

/s/ Edward Greenblat
Edward Greenblat
Georgia Bar No. 482735